

U.S. Application No. 09/889,380
Reply to Office Action of May 3, 2006

PATENT
450106-02849

REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith. The present amendment is being made to facilitate prosecution of the application.

I. STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 1-2, 6-14, and 18-24 are pending. Claims 1 and 13 are independent. Claims 1-2 and 13-14 are hereby amended. Claims 3-5 and 15-17 were canceled, without prejudice or disclaimer of subject matter. Support for this amendment is provided throughout the Specification as originally filed, and specifically at page 12, line 24, and page 14, lines 6-9.

No new matter has been introduced by this amendment. Changes to the claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

The Office Action asserts that Applicants have failed to traverse the Official Notice. However, Applicants' argument on pages 9-10 of the response filed February 15, 2006 is de facto traversal of the Official Notice. Applicants again respectfully traverse the Office Notice, and respectfully submit that using high-level commands in a *television system* is not prior art to the present invention. All prior art television systems of which Applicants are aware of use low-level commands. Applicants respectfully request a valid prior art reference teaching the use of high-level commands in a *television system*.

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II. REJECTIONS UNDER 35 U.S.C. §103(a)

Claims 1-2, 7-9, 13-14, and 19-21 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 5,838,383 to Chimoto et al. (hereinafter, merely "Chimoto").

Claims 6 and 18 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Chimoto in view of U.S. Patent No. 6,198,479 to Humpleman et al. (hereinafter, merely "Humpleman").

Claims 10-12 and 22-24 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Chimoto in view of U.S. Patent No. 6,469,742 Trovato et al. (hereinafter, merely "Trovato").

Claim 1 recites, *inter alia*:

"... a plurality of digital signal processing blocks including at least a signal processing block for decoding data of streams, each of said plurality of digital signal processing blocks having a general-purpose Central Processing Unit;

... wherein said Central Processing Units of each of said digital signal processing blocks interprets and executes said command, and

wherein data may be assigned priority in such a manner that streams of video data and streams of audio data that are assigned high priority are transmitted at high speed."
(Emphasis added)

As understood by Applicants, Chimoto relates to a media television receiver in which an NTSC tuner, an ISDB tuner, a CATV tuner, and a CATV modulator are connected to an analog switch box. Demodulation sections, an A/D, clock-reproducing section, and a modulation section are connected between the analog switch box a bus. MPEG2 video decoder sections, an MPEG2 audio decoder sections, an NTSC/EDTV horizontal decoder section, an EDTV vertical decoder section, an MPEG2 video encoder section, and an MPEG2 audio encoder

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section are connected between the bus and a bus. An audio amplifier, a graphics controller, and A/D conversion sections are connected the bus. The switch box and the buses are connected to a bus controller, which is connected to a CPU, a memory, and a remote-control I/F. These modules are selectively used to receive and process digital broadcasting signals, digital CATV signals or NTSC broadcasting signals.

As understood by Applicants, Humpelman relates to a method and system for commanding and controlling diverse home devices on a home network to perform a service. According to the method, a client device that is capable of displaying a user interface is connected to a home network. A software agent is executed on the client device to cause a user interface to be displayed on the client device. First and second home devices connected to the home network are selected from the user interface, and control and command data are sent from the client device to the first and second home devices to cause these devices to communicate with each other to perform the service.

As understood by Applicants, Trovato relates to an upgradeable television which includes a plurality of modules for providing operating functions for the upgradeable television, each module capable of identifying itself to a processor. The processor is coupled to each of the modules. The processor is for recognizing changes in the modules in accordance with the identification of the modules. A receiver is operatively connected to the processor for receiving information for upgrading the upgradeable television in accordance with new modules introduced into the upgradeable television.

Applicants respectfully submit that nothing has been found in Chimoto that would teach or suggest the above-identified features of claim 1. Specifically, Chimoto does not teach or suggest that each of the digital signal processing blocks has a general-purpose Central

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Processing Unit (CPU), where the CPU interprets and executes the command, as recited in claim

1. The Office Action on page 3 argues unconvincingly that "each of said plurality of digital signal processing blocks has a signal processor." Nowhere does Chimoto disclose this alleged feature. Furthermore, the purported "signal processors" cannot be general-purpose CPUs, as required in claim 1. Comparing Figure 1 of Chimoto to Figure 7 of the present invention, the difference between the two systems becomes clear. Figure 1 of Chimoto, and in fact all of Figures 1-4 & 13-20 of Chimoto, disclose a single CPU, most closely analogous to the host processing block of the present invention. None of the individual processing blocks have their own CPU, as required by claim 1 and clearly disclosed in Figure 7 of the Specification.

Further, the Office Action on page 3 asserts that "the CPU 313 [of Chimoto] executes this program to control the other components of the receiver." Applicants respectfully submit that this means that there is only a single CPU (313) which directly controls the other processing blocks in Chimoto. This clearly teaches away from the use of a separate CPU for each processing block, as required by claim 1.

Finally, Applicants respectfully submit that Chimoto does not disclose or suggest that data may be assigned priority in such a manner that streams of video data and streams of audio data that are assigned high priority are transmitted at high speed, also as recited in claim 1.

Humbleman and Trovato are relied upon solely to meet various limitations of the dependent claims. However, Humbleman and Trovato fail to meet the same limitations of the independent claims as discussed above in relation to Chimoto. For at least this reason, the combinations of Chimoto and Humbleman or Trovato fail to obviate the present invention.

Therefore, Applicants respectfully submit that claim 1 is patentable.

Claim 13 is similar in scope and is therefore patentable for similar reasons.

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III. DEPENDENT CLAIMS

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

CONCLUSION

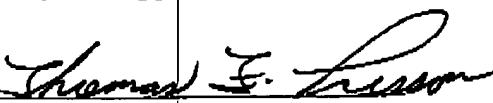
In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited references, it is respectfully requested that the Examiner specifically indicate those portions of the references providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

Applicants respectfully submit that all of the claims are in condition for allowance and request early passage to issue of the present application.

Respectfully submitted,

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